

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF IOWA

In Re:	Case No. 23-00484
<b>BDC GROUP, INC.,</b>	Chapter 11
Debtor-In-Possession.	<b>JOINDER TO KEYSTONE SAVINGS BANK'S RESISTANCE AND OBJECTION TO DEBTOR'S MOTION TO STAY CASE DEADLINES</b>

COMES NOW Manchester Leasing Services, Inc. ("MLS"), through its attorney, and pursuant to this Joinder does hereby join and adopt the objection and resistance filed by Keystone Savings Bank (Docket #374) to the Motion to Stay Case Deadlines as filed by the Debtor (Docket #372) for the reasons as set forth by Keystone Savings Bank in its Resistance and Objection. Manchester Leasing Services, Inc. has the same concerns voiced by Keystone Savings Bank as to Manchester Leasing Services, Inc.'s collateral, and is in the process of preparing a Motion for Relief from Automatic Stay that it will file in the near term requesting that it be granted relief to secure its remaining collateral.

WHEREFORE, Manchester Leasing Services, Inc. prays that the Debtor's Motion to Stay Case Deadlines be denied, and for any and all other relief deemed just and equitable in the premises.

Dated this 29<sup>th</sup> day of January, 2024.

Respectfully submitted,

/s/ Terry L. Gibson

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**COUNSEL TO MANCHESTER  
LEASING SERVICES, INC.**

**Certificate of Service**

The document was served electronically on parties who receive electronic notice through the CM/ECF as listed on CM/ECF's notice of electronic filing.

Dated this 29<sup>th</sup> day of January, 2024.

/s/ Terry L. Gibson

Terry L. Gibson